

EXHIBIT 1

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DECLARATION OF ROY E. MILLER

I, ROY MILLER, say and declare as follows:

1. I am an individual over 18 years of age and competent to make this Declaration.

2. If called upon to do so, I could and would competently testify as to the facts set forth in this Declaration.

3. The facts set forth below are true of my personal knowledge.

4. I am an attorney at law duly admitted to practice before this Court and courts of the State of California.

5. I am an attorney with the law firm of Hansen & Miller, attorneys of record for thousands of victims of the fires started by PG&E in 2017 (the twenty fires generally referred to as the “North Bay”), 2018 (“Camp Fire”) and 2019 (“Kincade Fire”).

6. I make this Declaration in support of the motion to allow late filing of proofs of claim (“Motion”) on behalf of Lisa Wahnnon and her minor son B.C.W. (collectively “Movants”), whom lost their respective homes in the Tubbs Fire. Lisa Wahnnon and her minor son B.C.W. are jointly represented by Watts Guerra LLP and Hansen & Miller.

7. These clients did not have a claim filed before the December 31, 2019 claims bar date due to excusable neglect and should be allowed to file a proof of claim after the bar date.

8. Movants lost their home in the Tubbs Fire. A letter from Lisa Wahnnon is attached to this declaration as Exhibit A. Lisa Wahnnon describes herself as not a litigious person and although her family had substantial losses in a PG&E caused fire she was reluctant to be involved with a claim. Just after the initial claims bar date, on October 23, 2019 PG&E caused the Kincade Fire. Lisa Wahnnon was ordered to evacuate from her new home due to the Kincade Fire. She reports this stress and fear from another evacuation triggered her emotional distress over wildfire and distracted her from filing a claim. Lisa Wahnnon contacted our office a few days after the

1 December 31, 2019 claims bar date and decided to pursue a claim for herself and her minor son.

2 9. On January 29, 2020, Watts Guerra LLP and Hansen & Miller filed claim numbers
3 96822 and 96821 on behalf of the Movants (“Subject Proofs of Claims”). True and correct copies
4 of the Subject Proofs of Claims are attached collectively hereto as Exhibit B.
5

6 I declare under penalty of perjury under the laws of the State of California that the
7 forgoing is true and correct and executed this 24th day of May 2020.
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9 /s/ Roy Miller
10 Roy Miller
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